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SOUTHWEST GAS CORPORATION

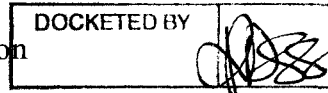
Justin Brown, Assistant General Counsel/Legal Affairs

May 24, 2011

Arizona Corporation Commission
DOCKETED

MAY 26 2011

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007



AZ CORP COMMISSION
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Re: Docket No. RG-00000B-09-0428
Southwest Gas Corporation Implementation Plan

On November 12, 2010, Southwest Gas Corporation (Southwest Gas or Company) filed its application for approval of a rate increase (Application). Included in its filed Application (Docket No. G-01551A-10-0458) was Southwest Gas' Energy Efficiency (EE) and Renewable Energy Resource Technology (RET) program plan.

The EE and RET Plan was created in response to the energy efficiency Standards approved by the Commission in Docket No. RG-00000B-09-0428. Southwest Gas' EE and RET Plan sets forth how the Company intends to comply with the Standards in its first 12-month period following Commission approval of the plan, and specifically describes Southwest Gas' various EE and RET programs and their estimated therm savings. Southwest Gas' EE and RET Plan also provides sufficient information to estimate the total cost and cost per therm reduction of each program and its respective measures.

Sincerely,

Justin Lee Brown